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JEFFERY and CAROLE PAUL

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re PG&E CORPORATION,
Debtor.

) Case No.: 19-30088-DM

) **CREDITORS JEFFERY AND CAROLE**
) **PAUL'S MOTION FOR LEAVE TO FILE**
) **A LATE PROOF OF CLAIM**

) DATE: July 12, 2022
) TIME: 10:00 a.m.
) CRTRM: 17

) Hon. Dennis Montali
)

TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE,
DEBTOR PG&E CORPORATION AND ITS ATTORNEYS OF RECORD, AND ALL PARTIES
IN INTEREST:

PLEASE TAKE NOTICE that Jeffery Paul and Carole Paul will and do hereby move the Court for an Order granting them leave to file a late proof of claim regarding their claim for damages caused by the Camp Fire (the "Motion").

The Motion is made on the grounds that Jeffery and Carole Paul's late filing of their Proof of Claim is the result of a violation of their due process rights within the meaning of Mullane v. Cent. Hanover Bank & Tr. Co., 339 U.S. 306, 70 S. Ct. 652, 94 L. Ed. 865 (1950) and excusable neglect within the meaning of Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership, 507 U.S. 380, 113 S. Ct. 1489, 123 L. Ed. 2d 74 (1993).

The Motion is based on the accompanying Memorandum of Points and Authorities, Affidavit of Jeffery and Carole Paul, Notice of Hearing, the pleadings and records on file with respect to PG&E

1 Corporation's bankruptcy case, and such other and further evidence and oral argument as may be
2 presented to the Court at the hearing.

3 WHEREFORE, Jeffery Paul and Carole Paul pray that this Court grant the Motion, and for such
4 other and further relief as the Court deems just and proper.

5 SUPPA, TRUCCHI & HENEIN, LLP.
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7 DATED: June 10, 2022

By: /s/ Sammy Henein
8 Sammy Henein, Esq.
9 Attorneys for Jeffery and Carole Paul
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